

City of Graham

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July 17, 2007

Re: Jordan Lake Rules
Public Hearing

I am opposed to the proposed Jordan Lake Rules and I have particular concern for the proposed stormwater rules. I would like to touch on a couple of points briefly.

1. The Jordan Lake rules seem to emulate the requirements already mandated in the Phase II stormwater program that many local governments in the Jordan Lake watershed have just began to implement. Recognizing the fact that implementation of the Phase II rules are in their infancy, it seems as if we are not giving them a chance to improve water quality as intended.

I would suggest that in an effort to conform to the Division of Water Quality's adaptive management strategy, the Jordan Lake Stormwater rules should not apply to Phase I and II communities. Rather, provide the Division of Water Quality an opportunity and the resources to make a SOUND determination on the progress of Phase I and II regulations as it relates to Jordan Lake and make adjustments accordingly.

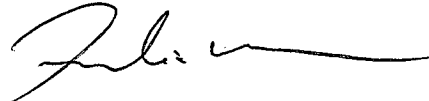
2. The second point I want to make concerns the feasibility of the stormwater management for existing development. Based on my understanding of the rules, local governments are charged with conducting feasibility studies on possible projects following implementation of the rules. It seems as if more research into the feasibility of managing stormwater from existing development should take place before implementation of the rules. Furthermore, it is widely considered that there is an enormous cost to address existing development with limited benefit.

I do realize that the more recent version of the rules provide local governments with more options to address existing development. However, recognizing that the determination of feasibility ultimately rests with the Division of Water Quality and the fact that those

additional options were not in the original rules, you can't help but wonder how much consideration those options will get.

In conclusion, give Phase II Stormwater Rules a chance to improve water quality in Jordan Lake before enacting more stringent rules that are not certain to improve water quality and seriously consider the feasibility of stormwater controls for existing development before implementation of the rules.

Respectfully Submitted,

A handwritten signature in dark ink, appearing to read 'Frankie Maness', with a long horizontal flourish extending to the right.

Frankie Maness
Assistant City Manager